

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

ATTORNEY MONTHLY FEE STATEMENT COVER SHEET
FOR THE PERIOD JULY 1, 2023 THROUGH AUGUST 11, 2023

In re LTL Management LLC

Applicant: Cole Schotz P.C.

Case No. 23-12825 (MBK)

Client: Ad Hoc Committee of Supporting
Counsel

Chapter 11

Case Filed: April 4, 2023

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.

<u>/s/ Michael D. Sirota</u>	<u>09/08/2023</u>
MICHAEL D. SIROTA	Date

<p style="text-align: center;">SECTION I FEE SUMMARY</p>
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Summary of Amounts Requested for the Period
July 1, 2023 through August 11, 2023 (the “Compensation Period”)

Total Fees	\$174,520.00
Total Disbursements	\$1,417.33
Minus % holdback of Fees	\$34,904.00
Amount Sought at this Time	\$141,033.33

Summary of Amounts Requested for Previous Periods

Total Previous Fees and Expenses Requested:	\$1,020,713.53
Total Fees and Expenses Allowed to Date:	\$0.00
Total Retainer Remaining:	\$0.00
Total Holdback:	\$202,843.80
Total Received by Applicant:	\$478,275.26

Name of Professional and Title	Year Admitted	Hours	Rate	Fee
Michael D. Sirota Member	1986	1.30	\$1,200.00	\$1,560.00
Warren A. Usatine Member	1995	7.30	\$950.00	\$6,935.00
Seth Van Aalten Member	2004	54.00	\$950.00	\$51,300.00
Justin R. Alberto Member	2008	27.60	\$740.00	\$20,424.00
Ryan T. Jareck Member	2008	1.70	\$695.00	\$1,181.50
Sarah A. Carnes Member	2015	10.40	\$760.00	\$7,904.00
Mark Tsukerman Member	2010	51.80	\$625.00	\$32,375.00
Stacy L. Newman Member	2007	11.10	\$650.00	\$7,215.00
Bryant P. Churbuck Associate	2018	79.70	\$460.00	\$36,662.00
Larry S. Morton Paralegal	n/a	21.70	\$355.00	\$7,703.50
Pauline Z. Ratkowiak Paralegal	n/a	3.50	\$360.00	\$1,260.00
TOTALS	n/a	270.10	n/a	\$174,520.00

**SECTION II
SUMMARY OF SERVICES**

Services Rendered	Hours	Fee
Asset Analysis	0.00	\$0.00
Asset/Business Disposition	0.00	\$0.00
Assumption and Rejection of Leases and Contracts	0.00	\$0.00
Preference Actions/Response	0.00	\$0.00
Budgeting (Case)	0.00	\$0.00
Business Operations	0.00	\$0.00
Case Administration	15.90	\$6,002.00
Claims Administration and Objections	49.80	\$25,442.00
Corporate Governance and Board Matters	0.00	\$0.00
Data Analysis	0.00	\$0.00
Employee Benefits/Pensions	0.00	\$0.00
Fee Application Preparation	34.40	\$18,098.50
Fee Employment	0.00	\$0.00
Fee Objections	0.00	\$0.00
Financing	0.00	\$0.00
Litigation	83.90	\$65,712.00
Meetings of Creditors	0.00	\$0.00
Disclosure Statement	59.40	\$39,049.50
Plan of Reorganization	26.70	\$20,216.00
Real Estate	0.00	\$0.00
Regulatory Compliance	0.00	\$0.00
Relief from Stay	0.00	\$0.00
Reporting	0.00	\$0.00
Tax Issues	0.00	\$0.00
Valuation	0.00	\$0.00
Non-Working Travel	0.00	\$0.00
SERVICES TOTALS	270.10	\$174,520.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

Disbursements	Amount
Photocopying / Printing / Scanning	\$143.60
Court Fees	142.20
Online Research	\$44.67
Outside Printing	\$359.66
Depositions Transcript	\$727.20
DISBURSEMENTS TOTAL	\$1,417.33

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Kristopher M. Hansen (*admitted pro hac vice*)
Ryan P. Montefusco (*admitted pro hac vice*)

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Chicago, Illinois 60606
Matthew M. Murphy (*admitted pro hac vice*)
Matthew Micheli (*admitted pro hac vice*)

COLE SCHOTZ P.C.
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Warren A. Usatine
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700 Milam, Suite 1300
Houston, Texas 77002
Lenard M. Parkins (*admitted pro hac vice*)
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.,
AD HAC COMMITTEE OF SUPPORTING COUNSEL, FOR THE
PERIOD JULY 1, 2023 THROUGH AUGUST 11, 2023**

Cole Schotz P.C. ("Cole Schotz") submits this Monthly Fee Statement (the "Statement") for services rendered and expenses incurred as Counsel to the Ad Hoc Committee of Supporting Counsel² for the period commencing July 1, 2023 and ending August 11, 2023 (the "Statement Period"), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professions* [Docket No. 562] (as modified, the "Interim Fee Procedures Order").

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Cole Schotz for the Statement Period are annexed hereto. These invoices detail the services performed by Cole Schotz.

The fees requested and expenses incurred in this Statement are as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$174,520.00	\$34,904.00	\$139,616.00	\$1,417.33

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² On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket No. 838] that provides for the reimbursement of fees from April 18, 2023 through the termination of the Reimbursement Agreement (together, the "Fees and Expenses").

WHEREFORE, Cole Schotz respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$141,033.33 (80% of total fees and 100% of expenses) in accordance with the Reimbursement Order.

Dated: September 8, 2023

COLE SCHOTZ P.C.
*Counsel to Ad Hoc Committee
of Supporting Counsel*

/s/ Michael D. Sirota
Michael D. Sirota (NJ Bar No. 014321986)

EXHIBIT A



LTL MANAGEMENT LLC
N/A

Invoice Date: August 14, 2023
Invoice Number: 955607
Matter Number: 66055-0001

Re: LTL AD HOC GROUP

FOR PROFESSIONAL SERVICES THROUGH JULY 31, 2023

CASE ADMINISTRATION			9.00	3,551.00
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/04/23	LSM	COMPILE, REVIEW AND CIRCULATE TO CS TEAM AND CO-COUNSEL THE JUNE 30, 2023 HEARING TRANSCRIPT	0.30	106.50
07/04/23	LSM	PROCESS PAYMENT FOR HEARING TRANSCRIPTS	0.20	71.00
07/05/23	LSM	UPDATE CALENDAR WITH FILING DEADLINES	0.40	142.00
07/06/23	LSM	REVIEW BANKRUPTCY DOCKET AND INTERIM COMPENSATION ORDER FOR FILING DEADLINES AND RELATED UPDATES	0.30	106.50
07/06/23	LSM	COMPLETE DRAFT OF FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD TO B. CHURBUCK	1.50	532.50
07/07/23	LSM	EMAILS WITH S. CARNES REGARDING CALENDARING EVENTS	0.20	71.00
07/11/23	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION AND FILING DEADLINES	0.50	177.50
07/19/23	LSM	REVIEW BANKRUPTCY COURT DOCKET FOR CRITICAL DATES	0.20	71.00
07/19/23	PVR	EMAIL EXCHANGE WITH B. CHURBUCK AND S. CARNES, REVIEW, REVISE AND PREPARE AHC JOINDER TO DEBTOR'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW RE: MOTIONS TO DISMISS CHAPTER 11 CASE FOR FILING AND EFILE AND RETRIEVE JOINDER	2.80	1,008.00
07/19/23	LSM	EMAILS WITH CLAIMS AGENT REGARDING SERVICE OF DOCUMENTS	0.30	106.50
07/19/23	LSM	RESEARCH, COMPILE AND FORWARD HEARING TRANSCRIPTS TO B. CHURBUCK RE: BOY SCOUT CASE	0.40	142.00
07/20/23	LSM	ASSIST WITH PROCESS OF PAYMENT FOR HEARING TRANSCRIPTS	0.30	106.50
07/21/23	LSM	EMAILS WITH SERVICE AGENT REGARDING EDITS TO AFFIDAVIT OF SERVICE	0.30	106.50
07/25/23	SLN	CORRESPONDENCE WITH AHC;	0.20	130.00
07/26/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL S. VAN AALTEN RE: PENDING MATTERS	0.30	360.00
07/26/23	LSM	REVIEW, FILE AND CIRCULATE TO B. CHURBUCK THE AD HOC COMMITTEE OBJECTION TO MOTION TO DISQUALIFY LEGAL REPRESENTATIVE	0.40	142.00

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/28/23	LSM	REVIEW BANKRUPTCY DOCKET FOR CRITICAL DATES	0.30	106.50
07/29/23	SLN	REVIEW LTL PRESS RELEASE AND EMAIL WITH CS TEAM (.1);	0.10	65.00

CLAIMS ADMINISTRATION AND OBJECTIONS **49.80** **25,442.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/12/23	BPC	REVIEW TCC'S MOTION TO ESTIMATE VALUE OF TALC CLAIMS	0.60	276.00
07/12/23	JRA	REVIEW TCC'S MOTION TO ESTIMATE	0.80	592.00
07/12/23	SVA	REVIEW/ANALYZE TCC MOTION TO ESTABLISH BAR DATE	1.60	1,520.00
07/12/23	SVA	REVIEWED/ANALYZED TCC MOTION TO ESTIMATE CLAIMS	1.30	1,235.00
07/12/23	JRA	REVIEW TCC'S BAR DATE MOTION	0.90	666.00
07/12/23	BPC	REVIEW TCC'S MOTION TO ESTABLISH A BAR DATE FOR TALC CLAIMS	0.80	368.00
07/13/23	WAU	REVIEW TCC MOTION TO ESTIMATE CLAIMS AND APPOINT FEINBERG	0.70	665.00
07/13/23	WAU	REVIEW TCC MOTION TO ESTABLISH BAR DATE	0.60	570.00
07/14/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	2.70	1,242.00
07/14/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. TSUKERMAN RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	0.30	138.00
07/14/23	BPC	TELEPHONIC CONFERENCE WITH M. TSUKERMAN RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	0.50	230.00
07/15/23	BPC	REVIEW ADDITIONAL CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	2.20	1,012.00
07/15/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	4.00	1,840.00
07/16/23	BPC	REVIEW ADDITIONAL CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018(A)	2.70	1,242.00
07/17/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND 3018(A) OF THE BANKRUPTCY RULES	2.70	1,242.00
07/18/23	BPC	REVIEW ADDITIONAL CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	0.80	368.00
07/18/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	4.00	1,840.00

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/18/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. TSUKERMAN RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	0.90	414.00
07/19/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	3.60	1,656.00
07/19/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. TSUKERMAN RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	0.30	138.00
07/19/23	BPC	PREPARE MEMO RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	2.00	920.00
07/20/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND M. TSUKERMAN RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	0.30	138.00
07/20/23	BPC	PREPARE MEMO RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	4.30	1,978.00
07/20/23	BPC	TELEPHONIC CONFERENCE WITH S. VAN AALTEN AND M. TSUKERMAN RE: TCC'S MOTION TO ESTIMATE CLAIMS	0.40	184.00
07/20/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	2.80	1,288.00
07/21/23	BPC	REVIEW SELECT CASE LAW RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	2.50	1,150.00
07/21/23	BPC	PREPARE MEMO RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	4.00	1,840.00
07/21/23	BPC	REVISE MEMO RE: ESTIMATION OF CLAIMS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3018	1.50	690.00

DISCLOSURE STATEMENT

59.40 39,049.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	SVA	REVIEW/COMMENT ON REVISED DS	3.20	3,040.00
07/10/23	SVA	CORRES W/ CS AND PH TEAMS RE FIRST MONTHLY FEE APPLICATIONS	0.20	190.00
07/10/23	SLN	CORRESPONDENCE WITH AHC REGARDING SOLICITATION PROCEDURES (.1); REVIEW BLACKLINE DISCLOSURE STATEMENT AND SOLICITATION RELATED DOCUMENTS (1.1);	1.20	780.00
07/10/23	JRA	REVIEW REVISED SOLICITATION PROCEDURES AND DS PACKAGE (1.5); EMAILS WITH STEERCO MEMBERS RE SAME (.3)	1.80	1,332.00

Re: LTL AD HOC GROUP
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/23	JRA	EMAILS WITH PH AND CLIENTS RE AMENDED DS AND SOLICITATION PROCEDURES	0.30	222.00
07/11/23	WAU	REVIEW REVISED DISCLOSURE STATEMENT AND MOTION TO APPROVE	1.10	1,045.00
07/12/23	JRA	REVIEW MOTION TO APPROVE DS AND ATTENDANT DS FOR CHANGES	1.80	1,332.00
07/12/23	MT	REVIEW OF DEBTOR'S AMENDED DISCLOSURE STATEMENT AND RELATED FILINGS	1.40	875.00
07/12/23	BPC	REVIEW EMAIL FROM S. VAN AALTEN RE: DEBTOR'S NOTICE OF MOTION TO APPROVE DISCLOSURE STATEMENT AND AMENDED DISCLOSURE STATEMENT	0.10	46.00
07/14/23	MT	REVIEW DEBTOR'S DISCLOSURE STATEMENT MOTION, AND TCC'S ESTIMATION AND BAR DATE MOTIONS (2.5); EMAILS TO CO-COUNSEL B. CHARBUCK RE: SAME (.2); CONFERENCE WITH B. CHARBUCK RE: VOTING RESEARCH ISSUES (.5); CONDUCT LEGAL RESEARCH RE: SAME (1.1)	4.30	2,687.50
07/17/23	MT	RESEARCH AND DRAFT MEMO RE: VOTING ISSUES	2.40	1,500.00
07/18/23	MT	REVIEW PLEADINGS AND CONDUCT RESEARCH RE: ESTIMATION AND VOTING ISSUES;	10.60	6,625.00
07/19/23	MT	RESEARCH AND DRAFT MEMO RE: VOTING, ESTIMATION AND PLAN ISSUES	10.10	6,312.50
07/20/23	MT	RESEARCH AND DRAFT MEMO RE: VOTING AND PLAN ISSUES (10.6); REVIEW AND COMMENT TO CO-COUNSEL B. CHARBUCK RESEARCH MEMO RE: SAME (.8); CONFERENCE WITH CO-COUNSEL S. VAN AALTEN AND B. CHARBUCK RE: SAME (.3)	11.70	7,312.50
07/21/23	MT	DRAFT RESEARCH MEMO RE: PLAN AND VOTING ISSUES (9.1); EMAIL TO CO-COUNSEL S. VAN AALTEN RE: SAME (.1)	9.20	5,750.00

FEE APPLICATION PREPARATION

29.60 14,981.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/23	SLN	CORRESPONDENCE WITH CS TEAM AND CO-COUNSEL REGARDING FEE APPS (.1);	0.10	65.00
07/05/23	SYC	REVIEW REIMBURSEMENT ORDER AND INTERIM COMP. ORDER AND EMAIL TO PH TEAM RE: SAME	0.80	608.00
07/05/23	SVA	CORRES W/ S. CARNES AND PH TEAM RE FEE APPLICATIONS	0.30	285.00
07/05/23	SYC	EMAIL TO L. MORTON RE: INTERIM COMP. DEADLINES	0.20	152.00
07/07/23	LSM	ADDITIONAL UPDATES TO FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.50	177.50
07/10/23	BPC	REVIEW AND REVISE MONTHLY FEE STATEMENT	1.30	598.00
07/10/23	BPC	REVIEW EMAILS FROM M. MICHELI, J. MCMILLAN, L. PARKINS, AND C. RUBIO RE: PLAN AND DISCLOSURE STATEMENT	0.60	276.00
07/10/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES AND L. MORTON RE: MONTHLY FEE STATEMENTS	0.40	184.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND M. MICHELI RE: MONTHLY FEE APPLICATIONS	0.40	184.00
07/11/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MILOTES RE: MONTHLY FEE STATEMENTS	0.30	138.00
07/11/23	BPC	PREPARE AND REVISE APRIL AND MAY MONTHLY FEE STATEMENT	1.60	736.00
07/11/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES AND L. MORTON RE: MONTHLY FEE STATEMENTS	0.40	184.00
07/11/23	SVA	CORRES W/ PH AND CS TEAMS RE FEE APPLICATIONS	0.20	190.00
07/11/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES AND L. MORTON RE: MONTHLY FEE STATEMENTS	0.40	184.00
07/11/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN, L. PARKINS, AND C. RUBIO RE: MONTHLY FEE STATEMENTS	0.40	184.00
07/11/23	LSM	REVISE AND UPDATE FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ PER B. CHURBUCK COMMENTS	0.70	248.50
07/12/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: MONTHLY FEE APPLICATIONS	0.40	184.00
07/12/23	BPC	CONFERENCE WITH S. CARNES RE: MONTHLY FEE STATEMENTS	0.20	92.00
07/12/23	SYC	REVIEW EMAILS FROM PARKINS RUBIO RE: FEE APPLICATIONS AND RESPOND TO SAME	0.60	456.00
07/12/23	LSM	COMPLETE DRAFT OF FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO B. CHURBUCK	2.30	816.50
07/13/23	SVA	CORRES W/ PH AND PR TEAMS RE FEE APPLICATIONS	0.20	190.00
07/13/23	SYC	CALL WITH B. CHURBUCK RE: FEE APPLICATIONS	0.50	380.00
07/13/23	WAU	WORK ON REVIEW OF JUNE INVOICE FOR PREPARATION OF FEE APPLICATION	0.70	665.00
07/13/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. PETRIELLO RE: APRIL AND MAY INVOICES	0.40	184.00
07/13/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND M. MICHELI RE: MONTHLY FEE APPLICATIONS	0.20	92.00
07/13/23	BPC	PREPARE AND REVISE FIRST MONTHLY FEE STATEMENT	2.00	920.00
07/14/23	BPC	PREPARE EMAIL TO L. MORTON RE: MONTHLY FEE STATEMENTS	0.10	46.00
07/14/23	SYC	REVIEW OF CS AND PR FEE APPLICATIONS	0.50	380.00
07/14/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES RE: MONTHLY FEE APPLICATIONS	0.30	138.00
07/17/23	SVA	CORRES W/ PH AND PR RE FEE APPLICATION PREPARATION AND FILING	0.20	190.00
07/17/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. PETRIELLO RE: MONTHLY FEE STATEMENTS	0.60	276.00
07/17/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND S. CARNES RE: MONTHLY FEE STATEMENTS	0.40	184.00

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

Invoice Number 955607
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/23	BPC	REVISE MAY MONTHLY FEE STATEMENT	0.30	138.00
07/17/23	SYC	REVIEW CORRES ON FEE APPLICATION FILINGS	0.40	304.00
07/18/23	BPC	PREPARE EMAIL TO C. RUBIO RE: MONTHLY FEE STATEMENTS	0.10	46.00
07/18/23	LSM	REVIEW, FILE AND ORGANIZE SERVICE OF SIX MONTHLY FEE APPLICATIONS FOR MAY AND APRIL 2023 RE: PAUL HASTINGS, COLE SCHOTZ AND PARKINS RUBIO	1.50	532.50
07/18/23	LSM	REVISE FIRST AND SECOND MONTHLY FEE APPLICATIONS FOR COLE SCHOTZ AND FORWARD SAME TO B. CHURBUCK	0.40	142.00
07/18/23	JRA	EMAILS WITH PH AND S. VAN AALTEN RE FEE APPS	0.40	296.00
07/18/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES AND L. MORTON RE: MONTHLY FEE STATEMENTS	0.80	368.00
07/18/23	SVA	FINAL REVIEW/COMMENT ON CS APRIL AND MAY MONTHLY FEE APPLICATIONS	0.80	760.00
07/18/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND S. PETRIELLO RE: MONTHLY FEE STATEMENTS	0.40	184.00
07/18/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. MURPHY AND L. MILIOTES RE: MONTHLY FEE STATEMENTS	0.20	92.00
07/19/23	LSM	EDIT SERVICE LIST TO COS REGARDING SIX MONTHLY FEE APPLICATIONS	0.60	213.00
07/19/23	LSM	DRAFT COS REGARDING SIX MONTHLY FEE APPLICATIONS FOR COLE SCHOTZ, PAUL HASTINGS AND PARKIN RUBIO	0.40	142.00
07/20/23	LSM	REVISE COS REGARDING MONTHLY FEE APPLICATIONS PER B. CHURBUCK COMMENTS	0.60	213.00
07/20/23	LSM	EDIT/REVISE EXHIBIT LIST TO COS FOR MONTHLY FEE APPLICATIONS PER B. CHURBUCK COMMENTS	0.60	213.00
07/21/23	LSM	REVISE AND UPDATE COS TO MONTHLY FEE APPLICATIONS PER B. CHURBUCK COMMENTS	0.40	142.00
07/24/23	PVR	EMAIL FROM AND TO J. ALBERTO, M. BALES, I. PEREZ, C. SMITH AND L. MORTON RE: REQUESTED LEDES FILES FOR OUR APRIL AND MAY MONTHLY INVOICES	0.20	72.00
07/24/23	BPC	PREPARE JUNE MONTHLY FEE STATEMENT	0.50	230.00
07/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MORTON RE: JUNE MONTHLY FEE STATEMENT	0.30	138.00
07/24/23	PVR	EMAIL FROM J. ALBERTO AND TO L. MORTON AND ACCOUNTING RE: LEDES FILES FOR OUR APRIL AND MAY MONTHLY INVOICES	0.20	72.00
07/25/23	LSM	COMPLETE DRAFT OF THIRD MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO B. CHURBUCK	0.90	319.50
07/26/23	SVA	REVIEW CS THIRD MONTHLY FEE APP	0.40	380.00
07/26/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO K. MILIOTES RE: MONTHLY FEE APPLICATIONS	0.20	92.00
07/31/23	LSM	RESEARCH FEE APPLICATION PROCEDURES AND CNO DEADLINES	0.60	213.00

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

Invoice Number 955607
 August 14, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/23	BPC	PREPARE EMAIL TO AND REVIEW EMAIL FROM L. MILIOTES RE: MONTHLY FEE STATEMENTS	0.20	92.00

LITIGATION			58.60	46,587.50
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/23	JRA	EMAIL WITH CLIENTS RE INTERVENTION DECLARATION	0.10	74.00
07/01/23	JRA	EMAILS INTERNALLY AND WITH CLIENTS RE HEARING RECAP	0.20	148.00
07/01/23	WAU	REVIEW TRIAL SUMMARY AND HEARING TRANSCRIPTS	1.10	1,045.00
07/01/23	SLN	REVIEW SUMMARY OF MOTION TO DISMISS TRIAL (1.1);	1.10	715.00
07/03/23	SVA	CORRES W/ SINGLETON SCHREIBER RE MTD TRIAL	0.30	285.00
07/03/23	MT	REVIEW OF MEMO PREPARED BY CO-COUNSEL B. CHARBUCK RE: DISMISSAL TRIAL	1.00	625.00
07/06/23	JRA	REVIEW TCC'S REMOVAL OBJECTION	0.10	74.00
07/06/23	JRA	REVIEW ORAL ORDER RE 7/11 HEARING	0.10	74.00
07/12/23	JRA	REVIEW REVISED PI ORDER (.1) AND EMAIL WITH D. MERRETT RE SAME (.1)	0.20	148.00
07/12/23	BPC	PREPARE EMAIL TO COLE SCHOTZ LTL TEAM RE: 7.12 DOCKET FILINGS	0.30	138.00
07/12/23	JRA	REVIEW MOTION TO DISQUALIFY FCR	0.20	148.00
07/12/23	SVA	REVIEWED MAUNE RAICHLE MOTION TO REMOVE FCR	0.30	285.00
07/12/23	SYC	TELECONFERENCE WITH CS TEAM RE: DOCUMENT REVIEW FOR NON-BANKRUPTCY LITIGATION	0.50	380.00
07/12/23	BPC	REVIEW MRHFM'S MOTION TO DISQUALIFY RANDI ELLIS AS FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
07/12/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: 7.12 DOCKET FILINGS	0.30	138.00
07/12/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: 8.22 HEARING	0.10	46.00
07/12/23	SLN	REVIEW REVISED TDP AND ISSUES LIST AND CORRESPONDENCE WITH AHC (1.8);	1.80	1,170.00
07/13/23	SVA	FURTHER REVIEW/ANALYSIS OF TCC BAR DATE AND CLAIMS ESTIMATION MOTIONS	2.30	2,185.00
07/13/23	SVA	REVIEWED ORDER EXTENDING PI	0.30	285.00
07/13/23	WAU	REVIEW MRHFM MOTION TO DISQUALIFY ELLIS AS FCR	0.20	190.00
07/13/23	JRA	T/C WITH CLIENT RE DISQUALIFICATION MOTION AND TDP'S	0.30	222.00
07/19/23	SYC	REVIEW JOINDER AND CORRES RE: FILING OF SAME	1.50	1,140.00
07/19/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN, S. CARNES, AND R. MONTEFUSCO RE: JOINDER TO DEBTOR'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	1.00	460.00
07/19/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO P. RATKOWIAK RE: JOINDER TO DEBTOR'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.30	138.00

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

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 August 14, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/23	SVA	REVIEW/COMMENT ON DEBTOR/AHC PROPOSED FINDINGS RE MTD	1.60	1,520.00
07/19/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: JOINDER TO DEBTOR'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.40	184.00
07/19/23	SVA	MULT CORRES W/ PH TEAM RE DEBTORS PROPOSED FINDINGS RE MTD AND AHC JOINDER	0.60	570.00
07/19/23	SVA	REVIEWED JOINT STIPULATION AND AGREED ORDER RE ADMISSION OF EXHIBITS AND DEPOSITION DESIGNATIONS RE MTD	0.40	380.00
07/19/23	SVA	REVIEWED REVISED JOINT PROPOSED FINDINGS OF DEBTOR AND AHC RE MTD	0.40	380.00
07/20/23	JRA	REVIEW ARNOLD AND ITKIN POST-TRIAL BRIEF	0.90	666.00
07/20/23	RTJ	REVIEW LTL PLEADINGS	0.60	417.00
07/20/23	JRA	REVIEW DEBTORS' PROPOSED FINDINGS OF FACT	0.30	222.00
07/20/23	SVA	REVIEW/ANALYZE DEBTOR PROPOSED FINDINGS RE MTD	2.40	2,280.00
07/20/23	WAU	REVIEW PARTIES' PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	1.20	1,140.00
07/20/23	SLN	REVIEW AHC JOINDER TO DEBTOR'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW FOR MOTIONS TO DISMISS (.1);	0.10	65.00
07/20/23	BPC	PREPARE EMAIL TO COLE SCHOTZ LTL TEAM RE: PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.30	138.00
07/20/23	JRA	REVIEW JOINT EVIDENCE STIP	0.30	222.00
07/20/23	JRA	REVIEW UST JOINDER TO TCC'S PROPOSED FINDINGS OF FACT	0.10	74.00
07/20/23	SVA	REVIEW/ANALYZE MRHFM PROPOSED FINDINGS RE MTD	1.40	1,330.00
07/20/23	SVA	REVIEW/ANALYZE PAUL CROUCH PROPOSED FINDINGS RE MTD	0.70	665.00
07/20/23	SVA	REVIEWED MOTION TO DISQUALIFY FCR AND FCR RESPONSE	0.70	665.00
07/20/23	SVA	CORRES W/ PH TEAM, USATINE AND JARECK RE MOTION TO DISQUALIFY FCR	0.40	380.00
07/20/23	SVA	REVIEW/ANALYZE NEW MEXICO AND MISSISSIPPI PROPOSED FINDINGS RE MTD	0.40	380.00
07/20/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.30	138.00
07/20/23	JRA	CORRESPOND WITH CLIENTS RE POST-TRIAL MATTERS	0.30	222.00
07/20/23	SVA	CONF W/ M. TSUKERMAN AND B. CHURBUCK RE ESTIMATION AND BAR DATE RESEARCH	0.40	380.00
07/20/23	JRA	REVIEW DEBTORS' LETTER IN RESPONSE TO TCC SOLICITATION LETTER	0.10	74.00
07/20/23	JRA	REVIEW AHC'S PROPOSED FINDINGS OF FACT	0.80	592.00
07/20/23	JRA	REVIEW CROUCH'S PROPOSED FINDINGS OF FACT	0.40	296.00
07/20/23	SVA	REVIEW/ANALYZE TCC PROPOSED FINDINGS RE MTD	2.70	2,565.00

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 Client/Matter No. 66055-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/20/23	SLN	REVIEW PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW FOR MOTION TO DISMISS AND CORRESPONDENCE WITH AHC (3.3);	3.30	2,145.00
07/20/23	SVA	REVIEW/ANALYZE ARNOLD & ITKIN PROPOSED FINDINGS RE MTD	1.20	1,140.00
07/20/23	SVA	REVIEW/ANALYZE AHC STATES PROPOSED FINDINGS RE MTD	1.10	1,045.00
07/21/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES AND L. MILOTES RE: UPCOMING HEARINGS	0.30	138.00
07/21/23	JRA	REVIEW TCC'S PROPOSED FINDINGS OF FACT	2.10	1,554.00
07/21/23	JRA	REVIEW NEW MEXICO AND MISSISSIPPI'S PROPOSED FINDINGS OF FACT	0.30	222.00
07/21/23	JRA	REVIEW MRHFM'S PROPOSED FINDINGS OF FACT	0.70	518.00
07/21/23	SVA	CORRES W/ PH AND PR RE TCC ESTIMATION MOTION	0.30	285.00
07/21/23	SLN	CORRESPONDENCE WITH AHC AND REVIEW PROPOSED DISCOVERY (.1);	0.10	65.00
07/24/23	SVA	CORRES W/ PH TEAM RE AUG 2 HEARING MATTERS	0.20	190.00
07/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MILIOTES RE: JULY 27 HEARING	0.30	138.00
07/24/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. TSUKERMAN RE: AUGUST 2 HEARING	0.40	184.00
07/25/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO L. MILIOTES RE: JULY 27 HEARING	0.20	92.00
07/26/23	SVA	REVIEWED DEBTOR OBJECTION TO MOTION TO DISQUALIFY FCR	0.20	190.00
07/26/23	WAU	REVIEW OBJECTIONS (DEBTOR AND AHG) TO MOTION TO REMOVE FCR	0.40	380.00
07/26/23	SVA	CORRES W/ PH AND CS TEAMS RE JOINDER TO DEBTOR REPLY TO DISQUALIFY FCR	0.30	285.00
07/26/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN, L. MORTON, AND M. MICHELI RE: JOINDER TO OBJECTION TO MOTION TO DISQUALIFY THE FCR	0.40	184.00
07/27/23	SVA	T/C W/ M. MURPHY RE MTD TRIAL	0.40	380.00
07/28/23	JRA	CORRESPOND WITH CLIENTS AND PH RE OPINION AND NEXT STEPS	1.10	814.00
07/28/23	JRA	REVIEW OPINION	0.70	518.00
07/28/23	WAU	REVIEW COURT OPINION DISMISSING CHAPTER 11 CASE	0.40	380.00
07/28/23	SVA	CORRES W/ AHC MEMBERS RE MTD OPINION	2.70	2,565.00
07/28/23	SVA	REVIEW/ANALYZE MTD OPINION	2.30	2,185.00
07/28/23	SVA	CORRES W/ PH AND CS TEAMS RE MTD OPINION	0.70	665.00
07/28/23	BPC	REVIEW OPINION GRANTING MOTIONS TO DISMISS	2.30	1,058.00
07/28/23	SYC	REVIEW OPINION GRANTING MTD AND CORRES WITH AHC RE: SAME	1.20	912.00
07/28/23	MT	REVIEW COURT'S OPINION ON MOTION TO DISMISS	1.10	687.50

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/23	JRA	T/C WITH CLIENTS RE DISMISSAL ORDER	0.70	518.00
07/29/23	JRA	EMAIL WITH B. CHURBUCK RE APPEAL	0.10	74.00
07/31/23	JRA	REVIEW 8/2 HEARING AGENDA	0.10	74.00
07/31/23	SVA	T/C W/ AHC MEMBER RE MTD OPINION	0.40	380.00
07/31/23	JRA	T/C (.5) AND EMAILS (.2) WITH CLIENTS RE DISMISSAL AND NEXT STEPS	0.70	518.00

PLAN OF REORGANIZATION **26.70** **20,216.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	JRA	T/C WITH AD HOC MEMBER RE TDPS	0.30	222.00
07/11/23	JRA	ANALYZE REVISIONS TO TDP'S (.6); T/C WITH AD HOC GROUP MEMBER RE SAME (.2)	0.80	592.00
07/11/23	SVA	REVIEW FURTHER REVISED TDPS	0.40	380.00
07/11/23	SVA	REVIEW/ANALYZE REVISED TDPS FROM JONES DAY	0.80	760.00
07/12/23	JRA	EMAILS WITH K. HANSEN AND CLIENTS RE TDP ISSUES	0.30	222.00
07/12/23	SVA	REVIEW/ANALYZE AMENDED PLAN AND DS	4.20	3,990.00
07/12/23	SVA	REVIEW/ANALYZE REVISED TDP ISSUES LIST	0.40	380.00
07/12/23	SYC	BRIEF REVIEW OF REVISED TDP ISSUES LIST	0.40	304.00
07/12/23	JRA	REVIEW REVISED LIST OF OUTSTANDING TDP ISSUES	0.20	148.00
07/12/23	BPC	REVIEW EMAILS FROM K. HANSEN, C. RUBIO, AND M. WATTS RE: DISCLOSURE STATEMENT AND PLAN SOLICITATION PROCEDURES	0.30	138.00
07/16/23	BPC	TELEPHONIC CONFERENCE WITH STEERING COMMITTEE RE: TRUST DISTRIBUTION PROCEDURES	1.50	690.00
07/16/23	JRA	ANALYZE OPEN TDP'S ISSUES	0.40	296.00
07/16/23	JRA	T/C WITH STEERCO MEMBERS AND PH RE TDP'S	1.50	1,110.00
07/16/23	JRA	T/C WITH AD HOC MEMBER RE TDP'S	0.30	222.00
07/19/23	SVA	T/C W/ M. MURPHY RE PLAN AND TDPS	0.30	285.00
07/19/23	SVA	T/C W/ STEER CO RE TDP AND PLAN ISSUES	0.60	570.00
07/19/23	BPC	REVIEW BOY SCOUTS DISCLOSURE STATEMENT HEARING TRANSCRIPTS RE: TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING PURPOSES	1.00	460.00
07/19/23	BPC	REVIEW SELECT CASE LAW RE: SECTION 1126(C) OF THE BANKRUPTCY CODE	2.70	1,242.00
07/20/23	JRA	REVIEW TCC'S SOLICITATION LETTER	0.20	148.00
07/20/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: LETTERS FILED WITH THE COURT ON SOLICITATION MATERIALS	0.30	138.00
07/21/23	JRA	REVIEW UST SOLICITATION LETTER	0.10	74.00
07/21/23	SLN	REVIEW CORRESPONDENCE FROM TCC REGARDING SOLICITATION ISSUES (.2);	0.20	130.00
07/22/23	SVA	CORRES W/ MONTEFUSCO AND MICHELI RE ESTIMATION/TABULATION RESEARCH	0.40	380.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/23	SVA	REVIEW/REVISE ESTIMATION/TABULATION RESEARCH MEMO	4.30	4,085.00
07/24/23	SLN	REVIEW UPDATED PLAN ISSUES CHART (.1); REVIEW IMERYC/CYPRUS DRAFT TERM SHEET (.2);	0.30	195.00
07/24/23	SYC	REVIEW REVISED TDP ISSUES LIST	0.80	608.00
07/24/23	SVA	REVIEWED REVISED PLAN ISSUES LIST	0.40	380.00
07/24/23	SVA	REVIEWED DRAFT TERM SHEET RE IMERYC/CYPRUS SETTLEMENT	0.30	285.00
07/24/23	BPC	REVIEW EMAILS FROM M. MICHELI, J. ONDER, M. NACAWATI, AND A. ANDREWS RE: PLAN UPDATES AND SETTLEMENT NEGOTIATIONS	0.50	230.00
07/25/23	BPC	REVIEW EMAILS FROM C. RUBIO, J. ONDER, AND A. PULASKI RE: PLAN AND TRUST DISTRIBUTION PROCEDURES	0.30	138.00
07/25/23	BPC	TELEPHONIC CONFERENCE WITH STEERING COMMITTEE RE: PLAN AND TRUST DISTRIBUTION PROCEDURES	0.50	230.00
07/26/23	SVA	CORRES W/ STEER CO RE PLAN ISSUES	0.40	380.00
07/26/23	SLN	CORRESPONDENCE WITH AHC REGARDING PROPOSED PLAN MODIFICATION (.2);	0.20	130.00
07/26/23	BPC	REVIEW EMAILS FROM M. MICHELI, J. ONDER, AND M. WATTS RE: REVISIONS TO PLAN	0.50	230.00
07/27/23	JRA	CORRESPOND INTERNALLY AND WITH CLIENTS RE PLAN ISSUES	0.60	444.00

TOTAL HOURS 233.10

PROFESSIONAL SERVICES: \$149,827.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Bryant P. Churbuck	Associate	72.00	460.00	33,120.00
Justin R. Alberto	Member	21.60	740.00	15,984.00
Mark Tsukerman	Member	51.80	625.00	32,375.00
Michael D. Sirota	Member	0.30	1,200.00	360.00
Morton, Larry	Paralegal	15.10	355.00	5,360.50
Pauline Z. Ratkowiak	Paralegal	3.20	360.00	1,152.00
Ryan T. Jareck	Member	0.60	695.00	417.00
Sarah A. Carnes	Member	7.40	760.00	5,624.00
Seth Van Aalten	Member	46.00	950.00	43,700.00
Stacy L. Newman	Member	8.70	650.00	5,655.00
Warren A. Usatine	Member	6.40	950.00	6,080.00

Total 233.10 \$149,827.50

Re: LTL AD HOC GROUP
Client/Matter No. 66055-0001

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COST SUMMARY

<u>Description</u>	<u>AMOUNT</u>
PHOTOCOPYING / PRINTING / SCANNING	137.80
ONLINE RESEARCH	44.67
DEPOSITIONS TRANSCRIPT	640.80
OUTSIDE PRINTING	203.83
TOTAL COSTS	\$1,027.10

TOTAL SERVICES AND COSTS:	\$ 150,854.60
PREVIOUS BALANCE DUE:	\$ <u>542,438.27</u>
TOTAL DUE INCLUDING PREVIOUS BALANCE:	\$ <u>693,292.87</u>

TASK SUMMARY

<u>TASK CODE</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
NJ812	FEE APPLICATION PREPARATION	29.60	14,981.50
NJ821	LITIGATION	58.60	46,587.50
NJ823	DISCLOSURE STATEMENT	59.40	39,049.50
NJ839	CASE ADMINISTRATION	9.00	3,551.00
NJ840	CLAIMS ADMINISTRATION AND OBJECTIONS	49.80	25,442.00
NJ851	PLAN OF REORGANIZATION	26.70	20,216.00
Total		233.10	\$149,827.50



Cole Schotz P.C.
Court Plaza North
25 Main Street
Hackensack, NJ 07601
201-489-3000 201-489-1536
FEDERAL ID# 22-2113414

New York — Delaware — Maryland — Texas — Florida

LTL MANAGEMENT LLC
N/A

Invoice Date: August 14, 2023
Invoice Number: 955607
Matter Number: 66055-0001

REMITTANCE PAGE

PROFESSIONAL SERVICES THROUGH JULY 31, 2023

Client: AD HOC GROUP OF SUPPORTING COUNSEL
Matter: LTL AD HOC GROUP

TOTAL FEES:	\$	149,827.50
TOTAL COSTS:	\$	<u>1,027.10</u>
TOTAL DUE THIS INVOICE:	\$	150,854.60
PREVIOUS BALANCE DUE:	\$	<u>542,438.27</u>
AMOUNT DUE:	\$	<u>693,292.87</u>

PLEASE RETURN THIS COPY WITH YOUR PAYMENT

For payments via ACH (e-check) or Credit Card please visit

<http://payments.coleschotz.com>

or use the QR Code



For payments made via Wire

Account Name: Cole Schotz P.C.
Bank of America, Account #4380000240
ABA #026009593

Please call 201-525-6280 for assistance with payments

EXHIBIT B



LTL MANAGEMENT LLC

N/A

Invoice Date: August 29, 2023

Invoice Number: 955806

Matter Number: 66055-0001

Re: LTL AD HOC GROUP

FOR PROFESSIONAL SERVICES THROUGH AUGUST 11, 2023

CASE ADMINISTRATION			6.90	2,451.00
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/23	LSM	DRAFT INITIAL CNO REGARDING FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO B. CHURBUCK WITH COMMENTS	0.50	177.50
08/01/23	LSM	ASSIST WITH HEARING PREPARATIONS FOR AUGUST 2, 2023 HEARING	0.60	213.00
08/01/23	LSM	REVIEW AND BANKRUPTCY COURT DOCKET AND UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND HEARING DATE	0.40	142.00
08/02/23	LSM	REVISE SIX CERTIFICATES OF NO OBJECTION PER B. CHURBUCK COMMENTS REGARDING MONTHLY FEE APPLICATORS FOR COLE SCHOTZ, PAUL HASTINGS, AND PARKINS RUBIO	0.70	248.50
08/02/23	LSM	EMAILS WITH TRANSCRIBER REGARDING AUGUST 3, 2023 HEARING	0.20	71.00
08/03/23	LSM	REVISE SIX CERTIFICATES OF NO OBJECTION REGARDING MONTHLY FEE APPLICATIONS PER B. CHURBUCK COMMENTS	0.60	213.00
08/03/23	LSM	COMPILE, REVIEW AND CIRCULATE TO COLE SCHOTZ TEAM AND CO-COUNSEL THE AUGUST 2, 2023 HEARING TRANSCRIPT	0.20	71.00
08/03/23	LSM	REVISE AND FILE SIX CERTIFICATES OF NO OBJECTION REGARDING MONTHLY FEE APPLICATIONS FOR PAUL HASTINGS, COLE SCHOTZ AND PARKINS RUBIO	0.80	284.00
08/07/23	LSM	REVISE, FILE AND ORGANIZE SERVICE OF THREE MONTHLY FEE APPLICATIONS FOR JUNE 2023 FOR PAUL HASTINGS, COLE SCHOTZ, AND PARKINS RUBIO	0.70	248.50
08/07/23	LSM	EMAILS WITH SERVICE AGENT REGARDING THREE MONTHLY FEE APPLICATIONS FOR PAUL HASTINGS, COLE SCHOTZ AND PARKINS RUBIO	0.40	142.00
08/07/23	LSM	REVIEW FILING PROCEDURES FOR MONTHLY FEE APPLICATIONS	0.40	142.00
08/07/23	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES	0.30	106.50
08/07/23	LSM	REVIEW AND FILE LETTER TO JUDGE KAPLAN	0.30	106.50

Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

Invoice Number 955806
 August 29, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/09/23	LSM	FOLLOW UP EMAILS WITH SERVICE AGENT REGARDING SERVICE OF THREE MONTHLY FEE APPLICATIONS	0.20	71.00
08/10/23	LSM	EMAILS WITH SERVICE AGENT REGARDING AFFIDAVIT OF SERVICE REGARDING MONTHLY FEE APPLICATIONS	0.30	106.50
08/11/23	PVR	EMAIL FROM M. BALES AND EMAIL TO ACCOUNTING AND RESEARCH RE: LEDES FILE FOR JUNE 2023	0.30	108.00

FEE APPLICATION PREPARATION **4.80** **3,117.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO C. RUBIO AND L. PARKINS RE: JUNE MONTHLY FEE STATEMENTS	0.30	138.00
08/02/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM COLE SCHOTZ LTL TEAM RE: MONTHLY FEE STATEMENTS	0.30	138.00
08/02/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM M. MICHELI RE: MONTHLY FEE STATEMENTS	0.20	92.00
08/02/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM L. PARKINS AND C. RUBIO RE: MONTHLY FEE STATEMENTS	0.30	138.00
08/03/23	SYC	REVIEW CNOS AND EMAILS WITH B. CHURBUCK RE: SAME	0.30	228.00
08/03/23	BPC	TELEPHONIC CONFERENCE WITH L. MILIOTES RE: MONTHLY FEE STATEMENTS	0.10	46.00
08/03/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM L. MORTON RE: MONTHLY FEE STATEMENTS	0.30	138.00
08/03/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM C. RUBIO RE: MONTHLY FEE STATEMENTS	0.20	92.00
08/03/23	SVA	CORRES W/ PH AND PR TEAMS RE JUNE MONTHLY FEE APPLICATIONS AND CNOS FOR APRIL/MAY	0.20	190.00
08/03/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM PAUL HASTINGS TEAM RE: MONTHLY FEE STATEMENTS	0.20	92.00
08/07/23	JRA	EMAILS WITH S. VAN AALTEN RE FEE APPS	0.30	222.00
08/07/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM L. MILIOTES RE: MONTHLY FEE STATEMENTS	0.30	138.00
08/07/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM C. RUBIO RE: MONTHLY FEE STATEMENTS	0.20	92.00
08/08/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN RE: MONTHLY FEE STATEMENTS	0.20	92.00
08/08/23	WAU	WORK ON FEE APPLICATION FOR JULY 2023	0.60	570.00
08/09/23	WAU	CONTINUED WORK ON MONTHLY FEE APPLICATION	0.30	285.00
08/11/23	BPC	PREPARE EMAIL TO L. MORTON RE: INTERIM AND FINAL FEE APPLICATIONS	0.10	46.00
08/11/23	SVA	REVIEWED CS JULY MONTHLY FOR PRIVILEGE REDACTIONS	0.40	380.00

LITIGATION **25.30** **19,124.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
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Re: LTL AD HOC GROUP
 Client/Matter No. 66055-0001

Invoice Number 955806
 August 29, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/23	SVA	CORRES W/ M. MICHELI RE DISMISSAL ORDER	0.20	190.00
08/01/23	SVA	T/C W/AHC STEER CO RE DISMISSAL AND NEXT STEPS	0.70	665.00
08/01/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: 8/2 HEARING	0.10	46.00
08/01/23	RTJ	REVIEW LTL PLEADINGS	1.10	764.50
08/01/23	JRA	CORRESPOND WITH K. HANSEN AND STEERCO MEMBERS RE DISMISSAL ISSUES	0.30	222.00
08/01/23	JRA	REVIEW TCC PROPOSED DISMISSAL ORDER	0.20	148.00
08/01/23	JRA	T/C WITH PH, S. VAN AALTEN AND STEERCO MEMBERS RE DISMISSAL AND TOMORROW'S STATUS CONFERENCE	0.70	518.00
08/01/23	BPC	PREPARE EMAIL TO AND REVIEW EMAIL FROM MBK CHAMBERS RE: 8/2 HEARING	0.20	92.00
08/01/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN, M. MICHELI, AND L. MORTON RE: 8/2 HEARING	0.80	368.00
08/01/23	SLN	REVIEW MTD OPINION	1.70	1,105.00
08/02/23	SVA	CORRES W/ AHC MEMBERS RE SUBSTANTIAL CONTRIBUTION MOTIONS	0.20	190.00
08/02/23	SVA	CORRES. W/ PH AND PR TEAMS RE DISMISSAL ORDER	0.30	285.00
08/02/23	SVA	ATTENDING HEARING ON DISMISSAL STATUS CONFERENCE AND SUBSTANTIAL CONTRIBUTION MOTIONS	1.70	1,615.00
08/02/23	SVA	CONF W/ M. MURPHY RE DISMISSAL	0.40	380.00
08/02/23	MDS	ATTEND SUBSTANTIAL CONTRIBUTION MOTION HEARING	1.00	1,200.00
08/02/23	JRA	ATTEND HEARING (PARTIAL)	1.00	740.00
08/02/23	SYC	ATTEND HEARING ON DISMISSAL	1.70	1,292.00
08/02/23	BPC	ATTEND 8/2 HEARING	1.80	828.00
08/02/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND M. MICHELI RE: POST-DISMISSAL MATTERS	0.20	92.00
08/03/23	SVA	REVIEWED 8.2 HEARING TRANSCRIPT	0.60	570.00
08/04/23	SVA	REVIEW/COMMENT ON DRAFT DISMISSAL ORDER	0.60	570.00
08/07/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM S. VAN AALTEN RE: LETTER TO THE COURT ON DISMISSAL ORDER	0.50	230.00
08/07/23	SLN	REVIEW LETTER TO COURT REGARDING MTD ORDER AND AHC COMMENTS THERETO	0.20	130.00
08/07/23	JRA	CORRESPOND WITH CLIENTS RE DISMISSAL ISSUES	0.70	518.00
08/07/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM S. CARNES RE: LETTER TO THE COURT ON DISMISSAL ORDER	0.30	138.00
08/07/23	BPC	PREPARE EMAILS TO AND REVIEW EMAILS FROM S. VAN AALTEN, M. MICHELI, R. MONTEFUSCO, AND L. MILIOTES RE: LETTER TO THE COURT ON DISMISSAL ORDER	0.80	368.00
08/07/23	JRA	REVIEW MRHFM'S DISMISSAL LETTER	0.20	148.00
08/07/23	SYC	REVIEW LETTER RE: DISMISSAL ORDER AND CORRES WITH B. CHURBUCK RE: FILING OF SAME	0.60	456.00
08/07/23	SVA	CORRES W/ PH AND CS TEAMS RE LETTER SUBMISSION FOR DISMISSAL ORDER	0.30	285.00

Re: LTL AD HOC GROUP
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/23	JRA	REVIEW DRAFT LETTER TO COURT RE OPEN ISSUES	0.20	148.00
08/07/23	SVA	REVIEW/COMMENT ON AHC LETTER SUBMISSION RE DISMISSAL ORDER	0.60	570.00
08/08/23	JRA	REVIEW CROUCH DISMISSAL LETTER	0.20	148.00
08/08/23	JRA	REVIEW JONES DAY DISMISSAL LETTER	0.30	222.00
08/08/23	JRA	REVIEW TCC LETTER RE DISMISSAL	0.30	222.00
08/08/23	JRA	REVIEW UST DISMISSAL LETTER	0.10	74.00
08/08/23	SVA	REVIEWED DEBTOR, TCC AND OTHER LETTER SUBMISSIONS RE DISMISSAL ORDER TERMS	0.80	760.00
08/08/23	JRA	REVIEW AHGSC LETTER TO KAPLAN RE DISMISSAL	0.20	148.00
08/09/23	JRA	REVIEW DEBTOR SUPPLEMENTAL LETTER RE DISMISSAL	0.10	74.00
08/10/23	SLN	CORRESPONDENCE WITH AHC RE DISMISSAL ORDER	0.10	65.00
08/10/23	JRA	REVIEW MRHFM'S REPLY LETTER RE DISMISSAL	0.10	74.00
08/10/23	JRA	REVIEW BROWN RUDNICK LETTER RE DISMISSAL AND IMPROPER SUBMISSIONS	0.10	74.00
08/10/23	JRA	CORRESPOND WITH CLIENTS AND PH RE DISMISSAL ISSUES	0.80	592.00
08/10/23	SVA	CORRES W/ AHC STEER CO AND PROFESSIONALS RE IMPACT OF PURDUE APPEAL	0.40	380.00
08/11/23	BPC	REVIEW DISMISSAL ORDER	0.20	92.00
08/11/23	JRA	REVIEW DISMISSAL ORDER	0.10	74.00
08/11/23	SYC	REVIEW ORDER GRANTING MTD	0.40	304.00
08/11/23	JRA	REVIEW GIBBONS DISMISSAL LETTER	0.10	74.00
08/11/23	BPC	PREPARE EMAIL TO COLE SCHOTZ LTL TEAM RE: DISMISSAL ORDER	0.10	46.00
08/11/23	SVA	REVIEWED ENTERED DISMISSAL ORDER AND CORRES W/ AHC RE SAME	0.60	570.00
08/11/23	SLN	REVIEW DISMISSAL ORDER	0.40	260.00
TOTAL HOURS			37.00	

PROFESSIONAL SERVICES: \$24,692.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Bryant P. Churbuck	Associate	7.70	460.00	3,542.00
Justin R. Alberto	Member	6.00	740.00	4,440.00
Michael D. Sirota	Member	1.00	1,200.00	1,200.00
Morton, Larry	Paralegal	6.60	355.00	2,343.00
Pauline Z. Ratkowiak	Paralegal	0.30	360.00	108.00
Ryan T. Jareck	Member	1.10	695.00	764.50
Sarah A. Carnes	Member	3.00	760.00	2,280.00

COLE SCHOTZ P.C.

Re: LTL AD HOC GROUP
Client/Matter No. 66055-0001

Invoice Number 955806
August 29, 2023
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<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Seth Van Aalten	Member	8.00	950.00	7,600.00
Stacy L. Newman	Member	2.40	650.00	1,560.00
Warren A. Usatine	Member	0.90	950.00	855.00
Total		37.00		\$24,692.50

COST SUMMARY

<u>Description</u>	<u>AMOUNT</u>
COURT FEES	142.20
PHOTOCOPYING / PRINTING / SCANNING	5.80
OUTSIDE PRINTING	155.83
DEPOSITIONS TRANSCRIPT	86.40
TOTAL COSTS	\$390.23

TOTAL SERVICES AND COSTS:	\$ 25,082.73
PREVIOUS BALANCE DUE:	\$ 693,292.87
TOTAL DUE INCLUDING PREVIOUS BALANCE:	\$ 718,375.60

TASK SUMMARY

<u>TASK CODE</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
NJ812	FEE APPLICATION PREPARATION	4.80	3,117.00
NJ821	LITIGATION	25.30	19,124.50
NJ839	CASE ADMINISTRATION	6.90	2,451.00
Total		37.00	\$24,692.50



LTL MANAGEMENT LLC
N/A

Invoice Date: August 29, 2023
Invoice Number: 955806
Matter Number: 66055-0001

REMITTANCE PAGE

PROFESSIONAL SERVICES THROUGH AUGUST 11, 2023

Client: AD HOC GROUP OF SUPPORTING COUNSEL
Matter: LTL AD HOC GROUP

TOTAL FEES:	\$	24,692.50
TOTAL COSTS:	\$	<u>390.23</u>
TOTAL DUE THIS INVOICE:	\$	25,082.73
PREVIOUS BALANCE DUE:	\$	<u>693,292.87</u>
AMOUNT DUE:	\$	<u>718,375.60</u>

PLEASE RETURN THIS COPY WITH YOUR PAYMENT

For payments via ACH (e-check) or Credit Card please visit

<http://payments.coleschotz.com>

or use the QR Code



For payments made via Wire

Account Name: Cole Schotz P.C.
Bank of America, Account #4380000240
ABA #026009593

Please call 201-525-6280 for assistance with payments